State Of California The Resources Agency of California

Memorandum

Date : February 8, 2001
Telephone: ATSS (916) 654-4176
File: S/projects/delta/issuerpt.doc

To : Michal C. Moore, Presiding Member
William J. Keese, Associate Member

From : California Energy Commission - Kae C. Lewis
1516 Ninth Street
Sacramento, CA 95814-5512
Energy Commission Project Manager

Subject : **ISSUE IDENTIFICATION REPORT—Morro Bay Power Plant Project**

Attached is our Issue Identification Report for the Morro Bay Power Plant Project (00-AFC-12). This report serves as a preliminary scoping document identifying issues that we believe to be potentially significant. We will present the issues report at the Committee's scheduled Informational Hearing on February 20, 2001.

Attachment

cc: Proof of Service (00-AFC-12)
Ray Menebroker, ARB
Gary Willey, SLOAPCD
Peter Mackin, CAL-ISO
Dick Butler, National Marine Fisheries Service
Diane Steeks, US Fish and Wildlife Service
Matt Haber, U.S. EPA, Reg. IX
Henriette Groot, Coastal Alliance on Plant Expansion
Michael Thomas, Central Coast Regional Water Quality Control Board
David Schwartzbart, Central Coast Regional Water Quality Control Board
Deborah Johnson, California Department of Fish and Game
Greg Fuz, City of Morro Bay Public Services
Dan Chia, California Coastal Commission

Issue Identification Report

Morro Bay Power Plant Project (00-AFC-12)

February 2001

CALIFORNIA ENERGY COMMISSION

Energy Facilities Siting and Environmental Protection Division

Kae C. Lewis, Project Manager

ISSUE IDENTIFICATION REPORT
TABLE OF CONTENTS

PAGE No.

ISSUE IDENTIFICATION REPORT

Morro Bay Power Plant Project (00-AFC-12)

This report has been prepared by the California Energy Commission staff to inform the Committee and all interested parties of the potential issues that have been identified in the case thus far. These issues have been identified as a result of our review of the Morro Bay Power Plant Project Application for Certification (AFC), Docket Number 00-AFC-12. The Issue Identification Report contains a project description, a summary of potentially significant environmental issues, and a discussion of a proposed project schedule.

PROJECT DESCRIPTION

On October 23, 2000 Duke Energy Morro Bay LLC filed an Application for Certification (AFC) seeking approval from the California Energy Commission (Energy Commission) to construct and operate the proposed 1,200-megawatt (MW) Morro Bay Power Plant Project. The "modernization" Project is proposed to be located at the existing 1,002 MW Morro Bay Power Plant site that is owned and operated by Duke Energy. This site is located within the City of Morro Bay, San Luis Obispo County, near Morro Bay Harbor, bordered on the west by Embarcadero Road and on the east by Highway 1.

The new units will replace currently operating generation Units 1 and 2 (326 megawatts [MW], 1950's technology) and Units 3 and 4 (676 megawatts [MW], 1960's technology) with two state-of-the-art combined cycle units. Each new unit will be capable of producing 600 MW, so that upon completion, the Plant will be capable of producing a total of 1,200 MW. Each new unit will consist of two gas-fired turbines and one steam turbine driven by the heat produced by the other two turbines. Each new unit will have two, 145 foot tall stacks (the existing plant has three 450 foot tall stacks).

The new units are expected to be used for intermediate load operations. The units' duct-fired design enables approximately 84 MW of additional peak capacity per combined cycle unit when required by the electrical system or market conditions.

Natural gas will be delivered from Pacific Gas and Electric company's Kettleman Compressor Station through PG&E pipeline 306. Natural gas originates in the south with El Paso Natural Gas in Arizona and in the north with PG&E/Northwest in Oregon.

The combined cycle units are proposed to use a maximum of 475 million gallons per day (gpd) of seawater for cooling, which is a reduction of 29 percent from the existing plant's usage. MBPP's freshwater usage will be about 10,000 gpd from its onsite wells for routine operation and maintenance.

The MBPP will continue to interconnect with the electrical grid at the existing PG&E switchyard located on the plant site.

To control emissions of air pollutants, the MBPP's combined cycle units will use the best available control technology (BACT) including selective catalytic reduction (SCR) for control of nitrogen oxides (NOx) and an oxidation catalyst for control of carbon monoxide. The SCR system consists of a reduction catalyst and an aqueous ammonia injection system.

The Project will also include demolition of the on site fuel oil tank farm, the entire existing power plant equipment (boiler – steam turbine complex), and removal of three 450 feet tall exhaust stacks. Stage one, demolition of the tank farm, will take three months and be complete in 2002. Stage two, demolition of the three 450 foot stacks, will begin after commercial operation of the new units and will be complete by 2004. Stage three, dismantling the existing units, will be complete by the end of 2007.

The construction force necessary for the three construction stages is expected to be as follows: Stage I (3 months) will require an average of 35 workers. Stage II (21 months) will require approximately 900 workers during the peak months and 400 workers on average. Stage III (47 months) will require 100 workers during the peak months and 40 workers on average. Once the new units are on line, the operational staff required is expected to be about 75 workers, which is the same as the current number.

A series of traffic, landscaping and aesthetic features are also proposed, including Class I and II bike paths, installation of a bridge across Morro Creek, landscaping, and refurbishment of the sea water intake structure.

Duke Energy proposes construction of two new generating units in a single construction phase lasting 21 months, with initial start-up to follow one month later. Based on construction beginning in early-to-mid-2002, operation can begin in mid-2004. The capital cost of the modernization project is expected to be $650 million.

POTENTIAL ISSUES

This portion of the report contains a discussion of the potential issues the Energy Commission staff has identified to date. The Committee should be aware that this report may not include all the significant issues that may arise during the case, as discovery has not yet begun, and other parties have not had an opportunity to identify their concerns. The identification of the potential issues contained in this report was based on our judgement of whether any of the following circumstances will occur:

- significant impacts may result from the project which may be difficult to mitigate;
- the project as proposed may not comply with applicable laws, ordinances regulations or standards (LORS);
- conflicts arise between the parties about the appropriate findings or conditions of certification that could result in a delay in the schedule.

The following table lists all the subject areas evaluated and notes those areas where potential significant issues have been identified. Even though an area is identified as having no potential issues, it does not mean that no issue will arise related to the subject area. For example, disagreements regarding the appropriate conditions of certification may arise between staff and applicant that will require discussion at workshops or even subsequent hearings.

The following discussion summarizes each potential issue, identifies the parties needed to resolve the issue and suggests a process for achieving resolution. At this time, we do not see any of these potential issues as unresolvable. We plan to use this report to focus the analyses that will be included in the Preliminary Staff Assessment (PSA) and Final Staff Assessment (FSA).

Potential Issue	Subject Area	Potential Issue	Subject Area
No	Air Quality	No	Noise
No	Alternatives	No	Paleontologic Resources
Yes	**Biological Resources**	No	Public Health
Yes	**Cultural Resources**	No	Socioeconomics
No	Efficiency and Reliability	No	Soils
No	Electromagnetic Fields & Health Effects	**Yes**	**Traffic and Transportation**
No	Facility Design	No	Transmission Line Safety
No	Geological Resources	No	Transmission System Engineering
No	Hazardous Materials	**Yes**	**Visual Resources**
No	Industrial Safety and Fire Protection	No	Waste Management
Yes	**Land Use**	**Yes**	**Water Resources**

BIOLOGICAL RESOURCES

There are two potentially critical biological resources issues that may affect the timing and possible outcome of the AFC process for the Morro Bay Power Plant Project.

STUDIES ON THE AQUATIC RESOURCES OF MORRO AND ESTERO BAYS

The applicant proposes to continue the use of the existing once-through seawater cooling system that includes an intake structure that draws water from Morro Bay and an ocean discharge outfall that discharges to Estero Bay. It is expected that the overall seawater usage will decrease for the new combined cycle units by 29 percent from 464,000 to 330,000 gallons per minute (gpm). The issues raised by the withdrawal of seawater for cooling are the long-term impacts to aquatic

organisms from, first, the entrainment and impingement (drawing in and killing aquatic animals) at the intake in Morro Bay, and, second, the impact to aquatic resources of water temperature differentials caused by heated water discharged into Estero Bay.

Both of these activities are regulated by the Clean Water Act which requires a National Pollutant Discharge Elimination System (NPDES) permit for the discharge of pollutants from a point source. This permit is administered by the Central Coast Regional Water Quality control Board (RWQCB) with oversight by the State Water Resources Control Board (SWRCB) and the federal Environmental Protection Agency (USEPA). In preparation for the reissuance of the NPDES permit, the effects of impingement, entrainment and thermal discharge must be evaluated through biological studies of entrainment and impingement (known as "316(a)" studies) and studies of thermal discharge (known as "316(b)" studies). The purpose of the studies is to evaluate the existing condition of biological resources in Morro and Estero Bays and to estimate impacts to the aquatic life in these bays from the proposed power plant.

The staff assembled a Technical Working Group (TWG) containing agency representatives from California Department of Fish and Game (CDFG), California Energy Commission (CEC), California Coastal Commission (CCC), and CCRWQCB. The CCRWQCB and CEC have independent experts hired to assist with the study plans that have been developed by the TWG. The purpose of the TWG coordination is to ensure agreement on data and assumptions for the 316(a) and (b) studies and the study results. The 316(a) & (b) studies are not completed at this time. The projected date of completion is February 2001 for the entrainment and impingement study (316(b)) and April 2001 for the Thermal Discharge Study (316(a)). In addition, although these studies may be approved by the CCRWQCB, issues may be raised which will impact the AFC process. As noted later under *Participation of Local Citizens*, public review of these studies has raised numerous concerns.

DETERMINATION OF WHETHER THE ENDANGERED TIDEWATER GOBY IS BEING ENTRAINED

During the entrainment sampling, tidewater gobies were identified in collected samples. The tidewater goby is a small estuarine fish and is included on the federal endangered species list. US Fish and Wildlife Service (USFWS) agency staff have recommended that the tidewater goby be de-listed, but to our knowledge have taken no action. After identifying tidewater goby in the entrainment samples last year, Duke Energy contracted with an independent laboratory to do DNA testing to verify the visual taxonomic identification. The DNA tests were negative, meaning that the samples did not match tidewater goby DNA on record. The Technical Working Group has not decided how to resolve this issue as of this writing. Additional DNA testing may be done, or the samples may be reviewed again for visual identification using different taxonomic experts. If the issue is not resolved soon (April 15), staff will request a determination from the USFWS.

If the tidewater goby does occur and will be entrained in the power plant cooling system operation, then the federal government, through the USFWS, must ensure, through the issuance of an incidental take permit, that harm to that endangered species is avoided or mitigated in this project. This will necessitate either a Section 7 or Section 10 of the Endangered Species Act consultation. If there is a permit required by another federal agency, that agency must initiate a Section 7 consultation, which culminates in the USFWS issuance of a Biological Opinion. If there is not, then a Section 10 consultation, or Habitat Conservation Plan process (HCP) must be initiated. While either type of consultation results in the issuance of an incidental take permit, the Section 7 has a 135 day schedule which is typically a less lengthy process than the HCP. Staff is gaining information through its participation in the TWG and is requesting additional information from the applicant that will lead to a determination of impacts on aquatic resources.

CULTURAL RESOURCES

The Morro Bay Power Plant, is located on land that was inhabited during prehistoric and historic times by Native Americans. This land is the location of two identified archaeological sites and potential additional archaeological sites and/or historic resources. Record searches, literature reviews and field surveys completed by the applicant indicate the presence of resources that are of interest to California Native American tribes and other concerned groups. The issues that may affect the timing or possible outcome of the AFC process are the following:

MOA WITH SAN LUIS OBISPO COUNTY CHUMASH COUNCIL

After researching the plant site's ethnographic history and upon recommendation of the city of Morro Bay, Duke Energy entered into a Memorandum of Agreement (MOA) with the San Luis Obispo County Chumash Council (SLOCC). The MOA addresses Native American issues, the protection and preservation of Chumash burials, sacred lands, cultural materials, and other environmental issues of importance to the Chumash Council. The staff has identified two issues of concern with the MOA.

First, the MOA identifies the Chumash Council as the avenue for participation of other Native American groups or individuals that may have issues with the MBPP project. Public participation is an essential part of the CEQA process and it is incumbent upon the Energy Commission as lead agency to provide for wide public involvement regarding environmental concerns. Staff will endeavor to facilitate participation in the siting process by any concerned members of the public, including Chumash and Salinan groups or individuals who may not be members of the SLOCC.

Second, the MOA indicates that the ultimate disposition of non-grave cultural resources will be determined by the Chumash Project Supervisor, Duke Energy, and the project archaeologist in accordance with local laws, ordinances and regulations. The MOA states further that cultural resources will be reinterred on-site whenever possible. The staff suggests that because of the cultural and educational value of non-grave artifacts, Native American concerns should be regarded with

sensitivity, but alternatives should be considered that could provide at least limited access to the artifacts for scholars and Native Americans. Although "State Guidelines for the Curation of Archeological Collections" suggest that special consideration and assistance be given to Native American groups with heritage concerns, there is no provision for reinterring artifacts. The Guidelines also state "archaeological collections and their associated records that are created by compliance with environmental laws, regulations, and guidelines must be housed at qualified repositories that have capability to ensure adequate permanent storage security and ready access to qualified users" (State Historic Resources Commission, 1993).

LAND USE

There are several potentially significant land use issues that may affect the timing and possible outcome of the AFC process for the MBPP project. These issues include:

CITY OF MORRO BAY WATERFRONT MASTER PLAN

In the AFC process, the Energy Commission is obligated to ensure that a proposed new or modified power plant meet the local government's zoning standards in order to grant it a license for construction and operation. A significant impact could occur if the MBPP project is determined not to be in full compliance with the City of Morro Bay's adopted zoning regulations and its Waterfront Master Plan.

The California Coastal Act of 1976 directed local governments lying within designated coastal zone to develop a Local Coastal Plan (LCP). Once a LCP is certified by the California Coastal Commission (CCC), the authority to issue coastal development permits is delegated to the local jurisdiction. When the CCC certified the Morro Bay Coastal Program in 1984 it included the City's Coastal Land Use Plan and General Plan but did not include the Master Waterfront Plan which was not adopted by the City until 1996.

The AFC concludes that the proposed project will comply, at least partially, if not fully, with the City's Waterfront Master Plan. It is inferred in the AFC that since the Waterfront Plan has not yet been certified by the California Coastal Commission, compliance with the Plan's design guidelines is not mandatory. The City of Morro Bay and Duke Energy have been involved in a series of discussions regarding the proposed implementation of the City's Waterfront Master Plan. The staff has submitted requests for information to ascertain the current status of these discussions and the project's LORS compliance.

CUMULATIVE IMPACTS BY MBPP CONSTRUCTION WITH OTHER DEVELOPMENT PROJECTS

The AFC has identified between 17 and 25 projects which may be developed in the Morro Bay area within a five mile radius of the plant site. Potential overall cumulative impacts could occur if the construction periods of these projects occur concurrently with the MBPP project. The AFC concludes that "no cumulative land

use impacts have been identified as it is reasonable to assume that approval of the cumulative projects by the City of Morro Bay will require that the projects are consistent with applicable land use policies and the City of Morro Bay General Plan, CLUP and zoning ordinance."

Even if local zoning is not an issue per se, it is important that other local problems are not caused by construction activity from a number of construction projects occurring at one time. Such simultaneous activity could cause impacts which include traffic congestion and traffic delays caused by construction activities, increased mobile air emissions from motor vehicles and construction equipment, an increase in the noise levels due to construction activity, an influx of workers associated with construction activities to the area generating temporary housing concerns, and an increased demand on public services. The staff is requesting information to determine the timing of development projects to evaluate the proposed project's cumulative impacts in land use and other relevant technical areas.

TRAFFIC AND TRANSPORTATION

The MBPP project site is located within the City of Morro Bay in close proximity to key transportation arterials and commercial activity. There is one potentially significant traffic and transportation issue that may affect the timing and possible outcome of the licensing process for the MBPP project.

CONSTRUCTION AND DEMOLITION IMPACTS

The location of the proposed plant and the length of the construction period indicate potential for significant impacts of construction on transportation in the Morro Bay community. An evaluation of these potential impacts should include the consideration of increases in traffic over the six years of construction and decommissioning, the cumulative impacts of changes in traffic flow caused by other community development, impact of seasonal changes in traffic volume, and the maintenance of acceptable traffic movement throughout the community. In addition, the long construction period requires that the project maintain a traffic and transportation plan that ensures that the tourist and residents of Morro Bay are able to have access to the coastal area with minimal impact. An additional critical concern is that the age of the existing facility to be demolished could result in a significant volume of hazardous material being transported through the community for disposal. The staff is working with the applicant and other agencies to identify hazardous materials and the procedure and routes for transporting the material through the community and to disposal sites.

VISUAL RESOURCES

There are two potentially significant visual resources issues that may affect the timing and possible outcome of the AFC process for the MBPP project.

EFFECTIVENESS OF LANDSCAPING AND SCREENING PLAN

The AFC visual resources section has identified two locations where negative visual impacts will occur (Key Observation Points (KOP) 5 and 6). Given the highly industrial character of the proposed facilities as illustrated in the visual simulations for KOPs 5 and 6, and the close proximity of the proposed facilities to KOPs 5 and 6 (as well as Highway 1 [KOP 20] which was recently designated a State Scenic Highway in this area), the effectiveness of the landscaping and screening plan will be a critical factor in determining whether or not significant visual impacts will occur as a result of project implementation. At this juncture, the AFC contains insufficient information regarding the landscaping and screening plan to assess the plan's effectiveness in reducing these adverse visual impacts and determining whether or not significant visual impacts will occur. Staff is requesting additional information required for an evaluation.

RETENTION OF EXISTING POWER PLANT STACK

The AFC visual section suggests the possibility of retaining one of the existing stacks. Elimination of all three stacks is critical to offsetting the introduction of new, highly industrial-appearing facilities into sensitive viewsheds. The retention of even one of the stacks (either as part of the proposed project or as an alternative for Commission consideration) increases the likelihood that significant impacts would occur. Staff needs to determine from the applicant if the lighthouse concept is being considered as part of the project. If it is, additional information will be required to evaluate its impacts.

WATER RESOURCES

The proposed Morro Bay Power Plant Project will use both seawater and groundwater from onsite wells for its operations. Seawater required for cooling is projected to be 475 million gallons per day, a 29 percent reduction from its current use. The projected use of groundwater for maintenance and domestic use is slightly less than MBPP's current average use of 10,000 gpm (but which peaks at 100,000 gpm for short time periods). The following are the potential issues that relate to water supply and wastewater discharge that may affect the timing and possible outcome of the AFC process for the MBPP project.

ALTERNATIVE COOLING WATER SOURCES AND TECHNOLOGIES

Water supply for the proposed project is seawater from Morro Bay diverted for once-through cooling. However, this technology raises concerns about impacts on biological resources. Staff will be evaluating alternative sources of cooling water, including reclaimed water, as well as alternative cooling technologies such as dry and wet/dry cooling which may minimize water consumption and wastewater discharge.

RENEWAL OF NPDES PERMIT

To comply with the federal Clean Water Act, the Central Coast Regional Water Quality Control Board (CCRWQCB) has reviewed and reissued every five years the

National Pollutant Discharge Elimination System (NPDES) permit for the existing MBPP's cooling water intake and discharge. As noted in the Biological Resources section above, the applicant is responsible for the completion of the entrainment, impingement and thermal discharge studies before the NPDES can be reissued.

It is unknown whether the proposed project will be considered by the CCRWQCB to be a "new" discharge source or an "existing" discharge under the Clean Water Act and the California Thermal Plan. If the project is considered a new source, more stringent standards may apply. The applicant would like to have the discharge from the proposed combined cycle plant treated as an existing discharge and argues that: 1) the discharge is not due to a new process or product which may have a different waste stream, 2) the waste disposal system is not modified, 3) the disposal location is not altered, and 4) the estimated flow rate and amount will not increase. The CCRWQCB has not yet made a decision on this issue.

THREAT OF GROUNDWATER WELL CONTAMINATION

In May-June, 1999 MTBE was discovered in effluent samples of the City of Morro Bay's wastewater treatment plant. The release, which was detected in all effluent west of the intersection of Highway 41 (Atascadero Road) and Main Street, was traced to petroleum contamination at the Shell service station located at that intersection. The City of Morro Bay's municipal wells, located near the contaminated site and adjacent to MBPP, were closed. On January 18, 2001 the CCRWQCB issued an order which directs Equiva Services LLC (Shell) to investigate and cleanup the discharge of petroleum. Since the initial detection of MTBE the applicant has performed tests for MTBE in power plant wells and did not find contamination. There is a concern, however, that the water requirements proposed for the construction phase of the project will require substantial pumping and may draw the contaminated plume toward both the MBPP's and the City's well fields. The staff is requesting information from the applicant which will indicate the status of MTBE contamination in the MBPP wells. They are also requesting information on the potential for contamination in the future and, if necessary, the source of an alternate water supply.

COMMUNITY INTEREST

PARTICIPATION OF THE CITY OF MORRO BAY

On February 28, 2000 the City Council of Morro Bay approved a Memorandum of Understanding (MOU) with the applicant which pledged coordination in the pre-AFC planning process for the modernized MBPP. The MOU resulted in considerable outreach to and input from the Morro Bay community. As a result of MOU activities, the City developed recommendations (June 12, 2000) for the MBPP's Application for Certification. Ongoing discussions are occurring to address issues between Duke Energy and the City of Morro Bay that were not resolved in the AFC. These issues are in the following areas: traffic, land use, water supply, cultural resources, facility closure, building permit fees, and long term planning for Duke properties. Lack of resolution to the City's satisfaction in any area may result in delays in the AFC process schedule.

PARTICIPATION OF LOCAL CITIZENS

During the Data Adequacy phase many members of the Morro Bay community submitted comments on this project's AFC. A number of these commentors belong to a citizen action group and intervenor, the Coastal Alliance on Plant Expansion (CAPE). CAPE's mission includes the review of documents and scientific data related to this AFC and active public participation in this AFC process. Based on the comments received thus far, the key CAPE concern is the impact of the project on aquatic biological resources. Specific concerns were expressed over the 316(a) and 316(b) biological studies' methodologies and interim results. The following is an example of concerns expressed over information presented in the AFC:

- Determination of impacts of the proposed plant is hindered by insufficient data about all of the possible species of aquatic life in Morro and Estero Bays and the role of all *known* species in the estuary ecological system;
- References to data from earlier biological studies from the plant (i.e., PG&E studies) may not provide accurate comparisons from which to forecast project impacts;
- A comprehensive characterization of the source waters of Morro and Estero Bays is central to the analysis of project impacts. Source water volumes appear to be overestimated causing the impact of aquatic life affected by the plant to be underestimated;
- Not enough is known about the impact of the proposed plant on the tidal prism (amount of water that goes in and out of an estuary during a tidal cycle)

Other AFC specific concerns to CAPE and other public members include the consideration of offsite alternatives to the proposed plant, the possibility of increased air emissions, and the impact of the proposed plant on tourism and property values.

PROCEDURAL ISSUES

We have begun our analysis of the potential issues identified above, as well as our assessment of other environmental and engineering aspects of the applicant's proposal. As noted above, the first step in that assessment will be the issuing of data requests to the applicant in early February in a number of technical areas. Over the next few months, we will conduct publicly noticed workshops in Morro Bay to address identified concerns.

SCHEDULING

Our initial findings regarding the major issues discussed above, as well as other environmental and engineering findings will be presented in the PSA which is proposed to be filed on June 14, 2001. After filing the PSA, we will conduct public workshops to discuss its findings, recommendations and proposed conditions of certification. Based on these workshop discussions and other information that may

be provided, we will present our conclusions and recommendations in the Final Staff Assessment that is proposed to be filed by August 16, 2001.

Key events dictate whether staff will be able to meet the proposed PSA and FSA dates. The applicant must have timely responses to staff's data requests. To remain on schedule, the issues which are presented in this report must be resolved through data requests and workshops during the next three months.

In addition, the AFC schedule is dependent upon the permitting agencies fulfilling their responsibilities in a timely manner. To assist in this regard, the California Legislature passed SB 1388 (in effect on January 1, 2001) which requires local and state agencies which normally would have jurisdiction over a proposed project, to respond with comments and recommendations within 180 days of the filing of a complete project application. SLOAPCD expects to file its Preliminary Determination of Compliance (PDOC) by June 15, 2001. The NPDES permit issued by the CCRWQCB for cooling water and stormwater discharge is expected to be filed in draft form by July 10, 2001. The Facility Study being prepared by Pacific Gas and Electric Company (PG&E) for transmission interconnection is due in mid April, 2001.

Staff will work with the agencies to facilitate the timely issuance of their final reports. Staff will also issue monthly status reports to the Committee to keep them appraised of staff's resolution of issues and identification of new issues if they arise.

Staff's Proposed Schedule for the Morro Bay Power Plant

DATE	DAYS	EVENT
10/23/00	-	Morro Bay Power Plant AFC filed (00-AFC-12)
1/10/01	0	Energy Commission Deems AFC Complete
2/8/01	30	Staff files Issue Identification Report
2/9/01	31	Staff files First Set of Data Requests
2/20/01	42	Information Hearing, Issue Scoping & Site Visit
2/21-22/01	43-44	Data Request Workshop (First Set)
3/9/01	59	Data Request Responses Due From Applicant (First Set)
4/16/01	97	Applicant Provides PG&E's Facilities Study to CEC
5/15/01	126	CAL-ISO approves Facilities Study
6/14/01	151	Staff Files Preliminary Staff Assessment (PSA)
6/15/01	152	SLOAPCD Files Preliminary Determination Of Compliance (PDOC)
7/10/01	180	CCRWQCB Files Draft NPDES
7/10/01	180	SLOAPCD Files Final DOC
6/26-7/13/01	168-185	Staff holds various PSA workshops
8/16/01	219	Staff Files Final Staff Assessment (FSA)
8/27-9/10	230-244	Evidentiary Hearings
11/13/01	308	Committee issues Presiding Member's Proposed Decision
1/10/02	365	Commission Adopts Decision